

UNITED STATES DISTRICT COURT

for the

District of Oregon

United States of America

v.

WILLIAM ALLEN SHERRILL

Defendant(s)

Case No.

6:24-mj-176-MK

FILED _____
RECEIVED

Aug 19, 2024

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA
BY _____ DEPUTY**CRIMINAL COMPLAINT
BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 29, 2024 in the county of Coos in the
District of Oregon, the defendant(s) violated:*Code Section*

18 U.S.C. § 875(c)

Offense Description

Interstate Threatening Communications

This criminal complaint is based on these facts:

The attached affidavit of Special Agent Hunter Fikes, which is incorporated herein.

☒ Continued on the attached sheet.

/s/ Hunter Fikes, per rule 4.1

Complainant's signature

Hunter Fikes, Special Agent, FBI

*Printed name and title*Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone at 3:50pm a.m./p.m.Date: August 15, 2024City and state: Eugene, Oregon
Judge's signature

Mustafa T. Kasubhai

Printed name and title

DISTRICT OF OREGON, ss: AFFIDAVIT OF HUNTER E. FIKES

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Hunter E. Fikes, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since December 2022. My current assignment involves investigating child exploitation crimes, threat related crimes, and other federal violations. My training and experience include investigating federal criminal violations related to child exploitation, and child pornography, and interstate threats, among other federal violations. Prior to working for the Federal Bureau of Investigation, I worked for the Metropolitan Nashville Police Department where I worked numerous investigations, to include being a Detective in the Crimes Against Children Unit for three years. I have gained experience through work relating to conducting these types of investigations. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 875, and I am authorized by law to request a search warrant.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for William Sherrill (hereinafter “Sherrill”), for the violations of 18 U.S.C. § 875 (c), Interstate Communications (hereinafter, “Target Offense”). As set forth below, there is probable cause to believe, and I do believe, that Sherrill committed Target Offense in violation of 18 U.S.C. § 875 (c).

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Applicable Law

3. Title 18, United States Code, Section 875(c) prohibits communication containing any threat to injure the person of another.

Statement of Probable Cause

4. August 1, 2024, North Bend Police Department in North Bend, Oregon contacted FBI Eugene Resident Agency regarding threats made toward the Mill Casino located at 3201 Tremont Avenue, North Bend, Oregon 97459 by Sherrill. Sherrill used to be employed by the Mill Casino and still communicates with individuals who are currently employed by the Mill Casino.

5. Beginning in approximately June 2024, Sherrill began communicating threats about his termination to employees at the Mill Casino. North Bend Police Department responded to the casino and documented the incident. On July 18, 2024, North Bend Police Department received another call from an executive director at the Mill Casino regarding more threats that Sherrill had made, this time mentioning Sherrill had access to a firearm. On July 29, 2024, executive management again contacted the North Bend Police Department stating that Sherrill was now threatening to come to the Mill Casino.

6. On July 30, 2024, Officer Reed with the North Bend Police Department responded to the Mill Casino and met with executive management. Officer Reed was provided several screen shots of messages that were received on July 29, 2024, by a current employee (Adult Witness 1, or "AW1") from Sherrill detailing specific threats.

- "Call whoever you want, won't find me till it's too late and I'll take you all with me. I'm so excited!!!! This will be fun."

- “I have nothing to lose anymore and I’m desperate. I don’t need to tell you how dangerous that is. You know me Ken, you know I will.”
- “I’m living in an abandoned house slamming 8 balls and making boom booms.”
- “I’m this close to becoming a fucking terrorist.”
- “Why shouldn’t I burn that place to the ground and watch until the flames swallow me up too.”
- “I’m threatening you people with violence and death.”
- “When it happens just run, don’t try and stop me.”

Excerpts of the messages received by AW1 from Sherrill are depicted below. Sherrill’s contact number was saved in AW1’s phone as “William Work”. The comments in blue bubbles depict AW1’s texts; all others depict texts from Sherrill.

5:04

William Work

Yesterday, 8:16 PM

W How's the brewery coming along?! Pretty complicated? Can't wait to see it regardless. Probably no help employees are dropping like flies, wonder why that is... leave that place by the end of the upcoming month. I won't discriminate, despite who I thought you were. Don't think I'm scared of any law either, call whoever you want, won't find me till it's too late and I'll take you all with me. I'm so excited!!!! 😊 this will be fun... for me! Unless... you have another REAL good reason I shouldn't take my revenge on that place. Like.... REALLY fucking good. I have nothing to lose anymore and I'm desperate. I don't need to tell you how dangerous that is. You know me Ken, you know I will

W You'll only make it worse by ignoring me.

Ok I don't know what to tell you except I'm sorry you feel this way.i hope you don't get hurt or hurt anyone else. I miss you and think you can get through this

5:04

William Work

W I'm living in an abandoned house slamming 8 balls and making boom booms. I won't make it. What I'm trying to decide, is it worth taking that place with me. I think it is. You guys FUCKED me over so bad wtf did you expect me to do?! Your all fucked

W I would have stood up for any one of you and you know it

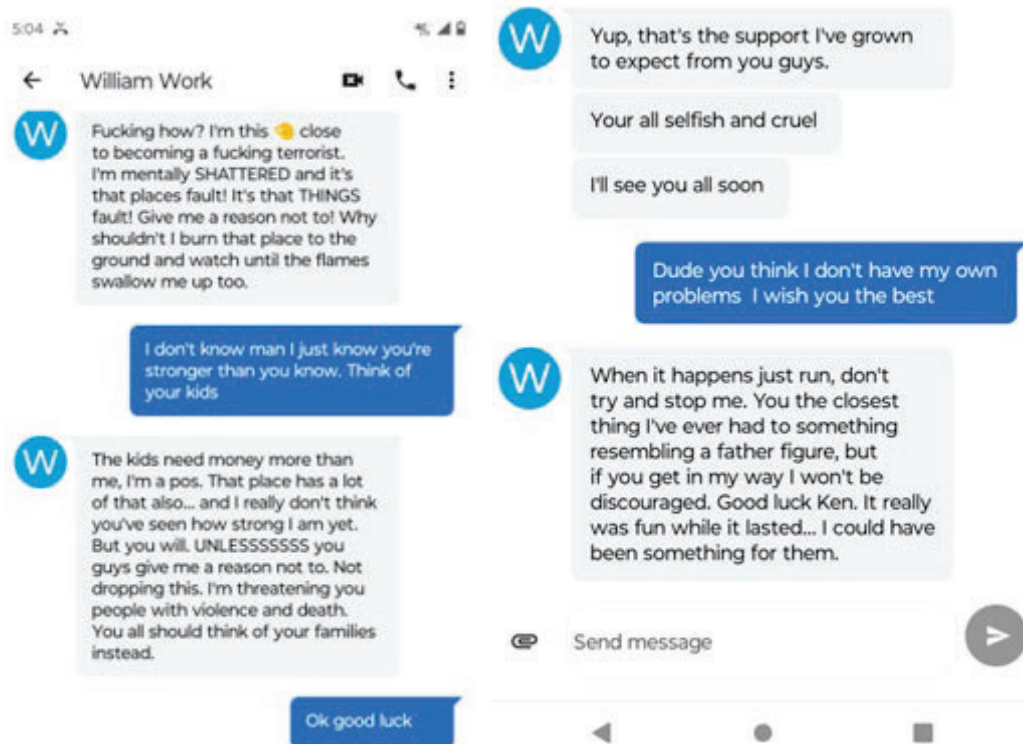
Even at the cost of my job. I would've done that for you guys

I know you that good

W Why didn't you say something?

I have I have supported you from the start

I still support you



7. On August 2, 2024, AW1 was interviewed by Special Agent Hunter Fikes. AW1 had known Sherrill for approximately 2-3 years since Sherrill had started working at the Mill Casino. AW1 believes that Sherrill made credible threats, and that Sherrill has the knowledge, means, and intelligence to carry out the threats he has described. AW1 also believes Sherrill is capable of carrying out the threats, based on drug use and the mental space Sherrill is presently in. Sherrill is known to use drugs and is currently homeless, living out of a vehicle at an unknown location. According to AW1, at all times he received text messages from Sherrill, the texts came from the phone number 541-294-2512, hereinafter “Target Cell Phone.”

8. On August 2, 2024, Adult Witness 2 (“AW2”), an employee in human resources for the Mill Casino, was interviewed. AW2 stated that Sherrill was terminated in June 2024 for his conduct, which included threats made towards the staff. The most recent phone number that

AW2 had for Sherrill was the Target Cell Phone number. AW2 stated that approximately 3-4 months prior to June 2024, Sherrill began inquiring about purchasing a firearm to staff members and even asked some staff about different gun ranges he could practice at. Another employee that AW2 was familiar with stated Sherrill used to live with them. During that time, Sherrill would take mental health medication, but stopped taking the medication which caused the employee to make Sherrill move out. AW2 mentioned that there are employees at the Mill Casino who are aware of the situation and the threats made by Sherrill and have opted to work from home, because they are scared to come to the Mill Casino. Additionally, AW2 provided that the Target Cell Phone is the number human resources had on file for Sherrill, which was provided by Sherrill on employment forms.

9. On August 2, 2024, Adult Witness 3 (“AW3”) was interviewed by Special Agent Hunter Fikes. AW3 has been in a relationship with Sherrill for approximately one year and they met at the Mill Casino. AW3 stated that Sherrill had been in Washington for at least the last month, and he/she knows this based on conversations he/she has had with Sherrill where he told AW3 he was staying in the Forks, Washington area with family. AW3 stated that Sherrill had talked about purchasing a firearm approximately 3-4 months ago, but he/she was not sure if Sherrill actually purchased the firearm. Based on their conversations, AW3 believed Sherrill was coming back to the North Bend, Oregon area for his daughter’s birthday in September 2024. AW3 confirmed that the phone number Sherrill is currently using is the Target Cell Phone.

10. On August 6, 2024, a search warrant was issued in the District of Oregon for the Geolocation of Target Cell Phone. The results from the search warrant, to include the historical data from the Target Cell Phone, was received on August 12, 2024. The results indicated that the

Target Cell Phone began making phone calls and was active in Washington on or about June 15, 2024. On July 29, 2024, all activity from the Target Cell Phone, to include the threatening messages listed above, was completed from Washington. On August 12, 2024, Target Cell Phone is still active in and around the Forks, Washington area. Based on the historical data received from Verizon pursuant to a search warrant that was issued in the District of Oregon there is probable cause to believe, and I do believe, William Sherrill was in Washington on July 29, 2024, at the time the threatening messages were sent to AW1.

Attempted phone calls to William Sherrill

11. The FBI called Sherrill on three different occasions with the intent of understanding his grievance to deescalate Sherrill from engaging in acts of violence and offer options to remedy the issue at hand. The first call was made on August 9, 2024. Sherrill answered his phone and after being informed of identify of the agent and the nature of the call, Sherrill became irate, screamed obscenities', and demanded the agents cease the investigation. Sherrill abruptly ended the phone call. Agents attempted another phone call with Sherrill shortly after and the call went straight to voicemail. A voicemail was left by agents and there was never a return phone call from Sherrill.

12. On August 12, 2024, FBI agents again attempted to contact Sherrill, calling twice in one hour. After the second phone call was made with no success, agents left another voicemail, requesting a return call, but Sherrill never reached back out.

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Conclusion

13. Based on the foregoing, I have probable cause to believe, and I do believe, that William Sherrill committed Target Offense in violation of 18 U.S.C. § 875(c). I therefore request that the Court issue a criminal complaint and arrest warrant for William Sherrill.

14. Prior to being submitted to the Court, this affidavit, the accompanying complaint and arrest warrant were reviewed by Assistant United States Attorney Adam Delph and advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Request for Sealing

15. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may endanger the life or physical safety of an individual, cause flight from prosecution, or otherwise seriously jeopardize an investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

By phone pursuant to Fed. R. Crim. P. 4.1

Hunter E. Fikes

Special Agent, FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at
3:50pm _____ a.m./p.m. on August 15, 2024.



HONORABLE MUSTAFA T. KASUBHAI
United States Magistrate Judge